

## Beckwith, William

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**From:** Beckwith, William  
**Sent:** Thursday, February 12, 2015 10:53 AM  
**To:** Tabor, Brock N (DEC)  
**Cc:** Sonafrank, Nancy B (DEC); Chung, Angela; Knittel, Janette; Pedersen, Rob; Fleisig, Erica  
**Subject:** RE: Alaska Triennial Review Public Announcement

Brock – EPA has reviewed the issues summary that accompanied ADEC’s public notice of its 2015 - 2017 Triennial Review (Division of Water 2015-2107 Triennial Review, Water Quality Standards Issues Summary, January 2015). We note that two of the three topics that are identified by ADEC as high priorities for rule making are Antidegradation Implementation Methods and Human Health Criteria. ADEC public noticed a proposed antidegradation implementation methods rule in January of 2014. EPA has been actively involved in ADEC’s efforts to develop and adopt antidegradation implementation methods and generally supports ADEC’s completion of that rule. Ensuring that water quality standards include up to date water quality criteria that are protective of human health, including the health of subsistence consumers of aquatic organisms, is important and EPA also supports ADEC addressing that issue. EPA encourages ADEC to address human health criteria for both carcinogens and non-carcinogens as part of the human health criteria topic under “High Priority Issues for Rulemaking.”

The third topic identified by ADEC as a high priority for rule making is the update of references to Standard Analytical Methods used to determine water quality. On January 13, 2015, ADEC public noticed proposed revisions to its references to analytical methods, as well as some additional revisions. EPA plans to provide comments on those proposed revisions by the due date of March 10, 2015.

Bacteria Criteria to protect recreational uses and Ammonia Criteria for the protection of aquatic life are included in ADEC’s issues summary under the headings of “Issues for Information Gathering and Analysis” and “Issues for Tracking and Monitoring,” respectively. In a letter of May 16, 2014 to ADEC, EPA highlighted its recent publication of ammonia and recreational criteria recommendations reflecting the latest science and urged ADEC to consider adoption of those criteria into its water quality standards. We again encourage ADEC to use its triennial review to consider adoption of these criteria.

As a BEACH Act state, Alaska has specific requirements regarding recreational water criteria. Section 303(i)(1)(B) of the Clean Water Act (as amended by the BEACH Act of 2000) directs each state or authorized tribe with coastal recreational waters to adopt and submit to the EPA new or revised water quality standards for those waters for all pathogens and pathogen indicators to which the new or revised water quality criteria are applicable. The deadline for state or tribal adoption and submittal to EPA of revised WQS is three years from EPA publication of new recommendations. Since EPA published final recreational water quality criteria recommendations in December 2012, BEACH Act states and authorized tribes should complete this action by December 2015. In addition, EPA has made future eligibility for the receipt of Beach Act funding contingent on a state or authorized tribe having an appropriate schedule to adopt revised recreational criteria consistent with the Beach Act. Beach Act grants provide for the collection of data important to protective beach management decisions, and EPA does not want Alaska to miss the opportunity to receive such funding.

Thank you for the opportunity to comment on ADEC’s Triennial Review.

Please contact me if you have questions

- Bill  
206-553-2495

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**From:** Tabor, Brock N (DEC) [mailto:brock.tabor@alaska.gov]  
**Sent:** Tuesday, January 13, 2015 2:40 PM

**To:** Chung, Angela; Beckwith, William; Tritt, Maja  
**Cc:** Sonafrank, Nancy B (DEC)  
**Subject:** Alaska Triennial Review Public Announcement

Good Afternoon Angela, Bill, and Maja,

The Alaska Department of Environmental Conservation (DEC), Division of Water is now accepting public comment on potential issues and updates to the Water Quality Standards in Title 18, Chapter 70 of the Alaska Administrative Code. The federal Clean Water Act requires states to conduct a review of topics associated with state water quality standards every three years. This process is known as the "Triennial Review" and ensures pollution limits for Alaska's waters are integrating the latest science, technology, policy, and federal requirements in state water quality regulations.

The Triennial Review is a planning process, not a rule making proceeding and will not directly result in new regulations.

You may comment on topics for consideration during the 2015-2017 Triennial Review cycle by submitting written comments to Brock Tabor, DEC Division of Water, at 410 Willoughby Ave, Suite 303, P.O. Box 11800, Juneau, Alaska 99811. Additionally, the Division of Water will accept comments by facsimile at (907) 465-5274 and by electronic mail at [brock.tabor@alaska.gov](mailto:brock.tabor@alaska.gov). Comments may also be submitted electronically through the Alaska Online Public Notice System at <http://aws.state.ak.us/OnlinePublicNotices>. The comments must be received no later than 4:30 p.m. on February 27, 2015.

Information on the Triennial Review process, high priority issues, and issue-specific fact sheets are located at <http://dec.alaska.gov/water/wqsar/trireview/index.htm>.

Hope all is well in Seattle. Will look forward to seeing your comments.

Please let me know if you have any questions.

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